

Case: 4:19-cv-13422

Judge: Leitman, Matthew F.

MJ: Stafford, Elizabeth A.

Filed: 11-19-2019 At 04:11 PM
COMP GRANT V. CENTRAL INTELLIGENCE AGENCY, et. al

UNITED STATES
EASTERN DISTRICT

WILLIAM LEE GRANT II
PLAINTIFF

CENTRAL INTELLIGENCE AGENCY
& SPECIAL COLLECTION SERVICE
DEFENDANTS

LH LGAN
6 O'CLOCK 2:10 PM
SUBPOENA DELL
FEDERAL QUESTION -
28 USC 1331

WHAT ARE THE RAMIFICATIONS
OF THE DOD KEEPING MR. GRANT
IN ILLINOIS FOR NEARLY
THIRTY (30) YEARS UNDER
THREAT OF MILITARY FORCE?

JAO

CIVIL LIBERTIES COMPLAINT

- ① DISTRICT COURT HAS JURISDICTION PURSUANT TO 28 USC 1331; 28 USC 1333; 42 USC 1983; 42 USC 1985(3); AND 28 USC 7391(b)(3).
- ② MR. GRANT HAS A CLAIM UNDER U.S. CONST. AMEND IV; U.S. CONST. AMEND V; U.S. CONST. AMEND XIII; AND U.S. CONST. AMEND XIV.
- ③ THE STATE OF ILLINOIS WAIVED SOVEREIGN IMMUNITY BY CONSENTING TO 16-cv-3245 AND 17-cv-3261 BEING REMOVED TO THE ILLINOIS CENTRAL DISTRICT FROM THE SEVENTH CIRCUIT OF ILLINOIS.
- ④ THE ILLINOIS ATTORNEY GENERAL AND U.S. DEPARTMENT OF JUSTICE (DOJ) DEFAULTED AND FAILED TO DENY MR. GRANT'S ALLEGATIONS IN 16-cv-3245 AND 17-cv-3261.
- ⑤ THE U.S. DEPARTMENT OF DEFENSE AND STATE OF ILLINOIS DO NOT HAVE SOVEREIGN IMMUNITY PURSUANT TO 42 USC 1983 AND 42 USC 1985(3).

- ⑤ THE DOJ DEFAULTED AND FAILED TO DENY MR. GRANT'S ALLEGATIONS IN 19-CV-3001.
- ⑥ THE ILLINOIS CENTRAL DISTRICT FAILED TO ENTER DEFAULT JUDGMENT AGAINST THE ILLINOIS ATTORNEY GENERAL AND DOJ IN 16-CV-3245, 17-CV-3261, AND 19-CV-3001.
- ⑦ THE ILLINOIS CENTRAL DISTRICT HAS NOT FOUND MR. GRANT'S ALLEGATIONS TO BE: 28 USC 1915(e)(2)(B)(i);
28 USC 1915(e)(2)(B)(ii); OR
28 USC 1915(e)(2)(B)(iii).
- ⑧ THE COMMANDER-IN-CHIEF (RONALD REAGAN) DIRECTED THE SECRETARY OF DEFENSE TO CREATE MR. GRANT TO PREDICT FUTURE NUCLEAR ATTACKS.
- ⑨ THE OFFICE OF THE SECRETARY OF DEFENSE CREATED MR. GRANT [REDACTED] AT AIR FORCE [REDACTED] SYSTEMS COMMAND IN 1990.
- ⑩ THE OFFICE OF THE SECRETARY OF DEFENSE "DROPPED" OFF" MR. GRANT IN SPRINGFIELD, ILLINOIS IN 1992 TO BE BEATEN; ENDURE PSYCHOLOGICAL WARFARE; AND TO BE THE U.S. DEPARTMENT OF DEFENSE'S (DOD) WITNESS TO THE 9/11 TERRORIST ATTACKS.
- ⑪ GREGORY K. HARRIS LEFT THE PENTAGON IN THE EARLY 1990's TO ILLEGALLY SURVEIL AND CONSPIRE AGAINST MR. GRANT THROUGH THE ILCD U.S. ATTORNEY'S OFFICE.
- ⑫ AFTER BEING CREATED IN 1990 AT AIR FORCE SYSTEMS COMMAND, MR. GRANT WAS TRANSFERRED TO THE BASEMENT OF THE 2 PENTAGON.

- (12) GREGORY K. HARRIS DIRECTED MR. GRANT'S DENTIST AND ORTHODONTIST TO DRILL THE ENAMEL OFF MR. GRANT'S TEETH.
- (13) GREGORY K. HARRIS DIRECTED MR. GRANT'S OPTOMETRIST TO GIVE MR. GRANT AN INCORRECT PRESCRIPTION LENS TO DIMINISH MR. GRANT'S VISION.
- (14) WHEN MR. GRANT TURNED SEVENTEEN (17) IN 2002, MR. GRANT WAS FORCED TO STAB DR. GRANT, OR THE OFFICE OF THE SECRETARY OF DEFENSE WOULD HAVE SENT SOMEONE TO KILL DR. GRANT.
- (15) GREGORY K. HARRIS UNDERMINED MR. GRANT'S LEGAL DEFENSE BY COLLUDING WITH MR. GRANT'S LAWYERS.
- (16) GREGORY K. HARRIS RECRUITED [REDACTED] (THEN LCD U.S. ATTORNEY) RODGER A. HEATON TO ILLEGALLY SURVEIL AND CONSPIRE AGAINST MR. GRANT.
- (17) MR. GRANT WAS FORCED TO "ACT GAY" FOR MORE THAN SEVEN (7) YEARS, OR THE OFFICE OF THE SECRETARY OF DEFENSE WOULD HAVE SENT SOMEONE TO RAPE MR. GRANT.
- (18) MR. GRANT WAS FORCED TO "ACT GAY" FROM DECEMBER 9, 2008 UNTIL 2016.
- (19) [REDACTED] GREGORY K. HARRIS RECRUITED NIVEL SHAW HILL TO [REDACTED] ILLEGALLY SURVEIL AND CONSPIRE AGAINST MR. GRANT.

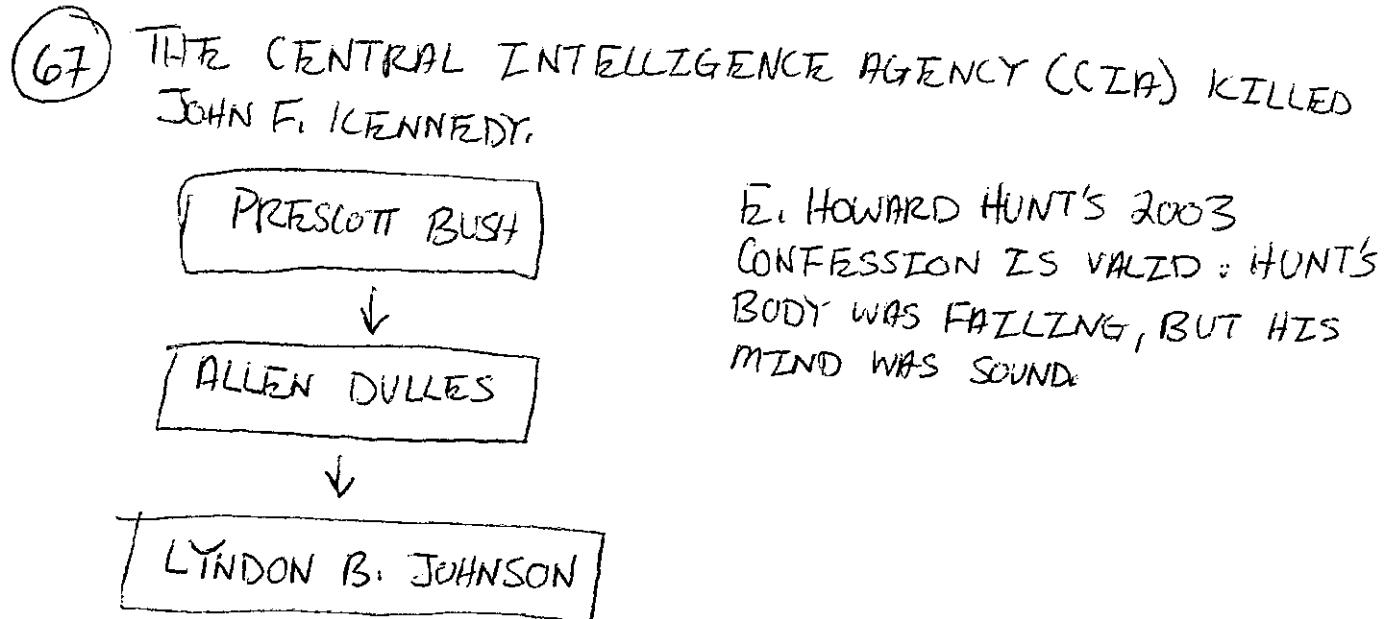
- ⑳ MR. GRANT WAS HIRED BY THE STATE OF ILLINOIS IN 2011 TO GIVE CAUSE FOR THE ILLINOIS ATTORNEY GENERAL TO APPEAR IN COURT.
- ㉑ DEIRDRE 'D.K.' HIRNER MADE AN AGREEMENT WITH THE DOD IN THE EARLY 1990'S TO HIRE MR. GRANT IN THE FUTURE.
- ㉒ ANN L. SCHNEIDER MADE AN AGREEMENT WITH THE DOD IN THE EARLY 1990'S TO HIRE MR. GRANT IN THE D.O.D. HIRNER [REDACTED] (CHIEF OF STAFF) HIRED MR. GRANT IN 2011 AS A POLICY ANALYST IN THE OFFICE OF THE ILLINOIS LIEUTENANT GOVERNOR.
- ㉔ ANN L. SCHNEIDER (SECRETARY OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION (IDOT)) HIRED MR. GRANT IN [REDACTED] 2012 AS A STAFF ASSISTANT WITH THE IDOT.
- ㉕ MR. GRANT FILED AN ETHICS COMPLAINT AND A CIVIL RIGHTS COMPLAINT WITH THE STATE OF ILLINOIS IN 2012.
- ㉖ MR. GRANT WAS RETALIATED AGAINST FOR FILING TWO COMPLAINTS WITH THE STATE OF ILLINOIS IN 2012.
- ㉗ MR. GRANT ENDURED A HOSTILE WORK ENVIRONMENT, WORK PRODUCTS BEING SABOTAGED, [REDACTED] GEOGRAPHIC RELOCATION, A PROMOTION BEING REVOKED, BEING ASSIGNED JOB TASKS BELOW MR. GRANT'S PAY GRADE, AND NEGATIVE PERFORMANCE EVALUATIONS.

- (28) IN NOVEMBER 2014, MR. GRANT TRANSFERRED FROM THE IDOT TO THE ILLINOIS GOVERNOR'S OFFICE.
- (29) IN DECEMBER 2014, THE ILLINOIS GOVERNOR'S OFFICE FAILED TO ADD MR. GRANT TO PAYROLL.
- (30) IN 2015, THE ILLINOIS DEPARTMENT OF EMPLOYMENT SECURITY WRONGFULLY [REDACTED] DENIED MR. GRANT FEDERAL UNEMPLOYMENT BENEFITS.
- (31) IN 2015, MR. GRANT FOUND HIMSELF BLACKLISTED.
- (32) IN 2003, ALIAN D. BRENTS AND LARISSA M. YOUNG SEXUALLY ASSAULTED MR. GRANT AT THE DIRECTION OF GREGORY K. HARRIS.
- (33) IN 2019, THOMAS W. COATS AND JUSTIN CASINDOS SEXUALLY ASSAULTED MR. GRANT AT THE DIRECTION OF GREGORY K. HARRIS.
- (34) THE DOD STOLE NEARLY THIRTY (30) YEARS OF MR. GRANT'S LIFE TO BRING THIS ACTION.
- (35) THE DOD KEPT MR. GRANT IN ILLINOIS FOR NEARLY THIRTY (30) YEARS UNDER THREAT OF MILITARY THREAT.
- (36) THE ACTIONS OF THE STATE OF ILLINOIS WERE ULTIMATELY DIRECTED BY THE DOD AND GREGORY K. HARRIS.
- (37) NINETEEN (19) FEDERAL COURTS HAVE NOT FOUND MR. GRANT'S ALLEGATIONS TO BE: 28 USC 1915(e)(2)(B)(i);
28 USC 1915(e)(2)(B)(ii); OR
28 USC 1915(e)(2)(B)(iii).
- [REDACTED]

- (38) THE ILLINOIS ATTORNEY GENERAL FAILED TO DENY MR. GRANT'S ALLEGATIONS IN THE SEVENTH CIRCUIT OF ILLINOIS (77-cv-754).
- (39) THE ILLINOIS ATTORNEY GENERAL FAILED TO DENY MR. GRANT'S ALLEGATIONS IN THE ILLINOIS COURT OF CLAIMS (18CC0946 + 18CC1057).
- (40) DONALD RUMSFELD GAVE A "STAND DOWN" ORDER ON 9/11 WITH THE CONSENT OF BUSH AND CHENEY.
- (41) THE OFFICE OF THE SECRETARY OF DEFENSE SAID DONALD RUMSFELD WAS AT AN AIRBASE ON 9/11, AND GAVE A "STAND DOWN" ORDER.
- (42) DONALD RUMSFELD WAS AT THE PENTAGON ON 9/11, AND GAVE A "STAND DOWN" ORDER WITH THE CONSENT OF BUSH AND CHENEY.
- (43) DICK CHENEY LOBBIED FOR THE INVASION OF IRAQ TO GENERATE PROFITS FOR HALLIBURTON.
- (44) DICK CHENEY MADE \$100 MILLION FROM HIS HALLIBURTON STOCK DUE TO THE WAR IN IRAQ.
- (45) BRUCE RAUNER BRIBED RAHM EMANUEL TO HIDE NATIONAL SECURITY REPORTS WHILE RAHM EMANUEL WORKED IN THE CLINTON WHITE HOUSE.
- (46) BRUCE RAUNER ASSISTED RAHM EMANUEL IN MAKING \$14 MILLION IN THREE YEARS UPON LEAVING THE CLINTON WHITE HOUSE.

- 47) BRUCE RAUNER WENT ON TO MAKE HUNDREDS OF MILLIONS [REDACTED] OF DOLLARS THROUGH DOD INFORMATION TECHNOLOGY CONTRACTS.
- 48) HILLARY RODHAM CLINTON KILLED VINCE FOSTER.
- 49) HILLARY RODHAM CLINTON SENT AMBASSADOR J. CHRISTOPHER STEVENS TO BENGHAZI, LIBYA AS A SUICIDE MISSION TO PREVENT THE AMBASSADOR FROM RELEASING A REPORT ADVOCATING THE DIVERSION OF FUNDS FROM IRAN TO LIBYA.
- 50) HILLARY RODHAM CLINTON LOBBIED FOR THE 1994 CRIME BILL IN EXCHANGE FOR FUTURE CAMPAIGN CONTRIBUTIONS DURING THE PRIVATE PRISON INDUSTRY.
- 51) HILLARY RODHAM CLINTON RECEIVED THE CONTRIBUTIONS DURING THE 2016 PRESIDENTIAL ELECTION.
- 52) BILL CLINTON FIRED FEDERAL BUREAU OF INVESTIGATION DIRECTOR WILLIAM S. SESSIONS TO CONCEAL THE MURDER OF VINCE FOSTER.
- 53) BILL CLINTON IS A SERIAL RAPIST.
- 54) RICHARD M. DALEY KILLED CHICAGO MAYOR HAROLD LEE WASHINGTON AND BERNARD LEPTON.
- 55) RICHARD M. DALEY'S SALE OF CHICAGO'S PARKING METERS IS FRAUD.
- 56) RICHARD M. DALEY SANCTIONED THE TORTURING OF AFRICAN-AMERICANS IN COOK COUNTY, ILLINOIS TO OBTAIN [REDACTED] WRONGFUL CONFESSIONS.

- (57) JAMES R. THOMPSON ASSISTED RICHARD M. DALEY CONCEAL THE MURDER OF CHICAGO MAYOR HAROLD LEE WASHINGTON AND BERNARD EPTON.
- (58) JAMES R. THOMPSON FAILED TO PROSECUTE RICHARD J. DALEY FOR PUBLIC CORRUPTION IN EXCHANGE FOR RICHARD J. DALEY SUPPRESSING THE DEMOCRATIC VOTE TO ALLOW JAMES R. THOMPSON TO WIN THE ILLINOIS GOVERNORIAL ELECTION AS A REPUBLICAN.
- (59) ANITA ALVAREZ (COOK COUNTY STATE'S ATTORNEY (ILLINOIS)) ENTERED INTO A CONSPIRACY TO ALLOW CHICAGO COPS TO SHOOT BLACK PEOPLE FOR SPORT WITHOUT FEAR OF CRIMINAL PROSECUTION.
- (60) PHILIP MOUNTBATTEN █████ ORDERED THE ASSASSINATION OF DIANA, PRINCESS OF WALES. THE BRITS NEED LOOK AT MI5.
- (61) THE HOUSE OF SAUD WAS COMPLICIT IN THE 9/11 TERRORIST ATTACKS.
- (62) LOUIS FARAKHAN █████ KILLED MALCOLM X.
- (63) COURTNEY LOVE KILLED KURT COBAIN.
- (64) MARION HOGA "SUGE" KNIGHT JR KILLED CHRISTOPHER "BIGGIE SMALLS" WALLACE.
- (65) SUGE KNIGHT BRIBED THE LOS ANGELES POLICE DEPARTMENT TO CONCEAL SUGE'S ROLE IN THE MURDER OF BIGGIE SMALLS.
- (66) O. J. SIMPSON KILLED NICOLE BROWN-SIMPSON AND RONALD GOLDMAN.



(68) HENRY KISSINGER IS A WAR CRIMINAL FOR HIS ROLE IN THE VIETNAM WAR, CAMBODIA, CHILE, AND ARGENTINA.

(69) THE CIA TRIANGULATED AGAINST THE DOB TO USE THE ██████████ DOB TO ACHIEVE THE CIA's MANDATE TO CONTAIN COMMUNISM IN SOUTHEAST ASIA.

(70) CHRIS CHRISTIE IS COMPLICIT IN THE FORT LEE LANE CLOSURE ("BRIDGE GATE").

(71) THE STATE OF ILLINOIS AND U.S. DEPARTMENT OF DEFENSE DO NOT HAVE SOVEREIGN IMMUNITY PURSUANT TO 42 USC 1983 AND 42 USC 1985(3).

(72) IN 2009, THE DOB, ILLINOIS STATE POLICE (ISP), AND GREGORY K HARRIS "SET-UP" MR GRANT FOR A DRIVING UNDER THE INFLUENCE (DUI) CHARGE.

(73) IN 2009, ISP TROOPER TYLER PRICE "STOPPED" MR GRANT FOR AN ALLEGED IMPROPER LANE CHANGE.

(74) ISP TROOPER TYLER PRICE FAILED TO MIRANDIZE MR. GRANT.

- (75) ISP TROOPER TYLER PRICE FAILED TO OBTAIN A WARRANT TO DRAW MR. GRANT'S BLOOD.
- (76) ISP TROOPER TYLER PRICE ISSUED MR. GRANT MULTIPLE DUI TICKETS STEMMING FROM ONE 2009 TRAFFIC STOP.
- (77) THE SANGAMON COUNTY STATE'S ATTORNEY'S OFFICE (ILLINOIS) FILED MULTIPLE DUI CASES AGAINST MR. GRANT STEMMING FROM ONE 2009 TRAFFIC STOP.
- (78) GREGORY K. HARRIS UNDERMINED MR. GRANT'S LEGAL DEFENSE BY COLLUDING WITH MR. GRANT'S LAWYERS.
- (79) MR. GRANT WAS SOBER.
- (80) THE DOJ, ISP, AND GREGORY K. HARRIS "SET-UP" MR. GRANT FOR A DUI TO "STRIP" MR. GRANT OF HIS DRIVER'S LICENSE TO LIMIT MR. GRANT'S OPTIONS FOR EMPLOYMENT UPON GRADUATING FROM COLLEGE.
- (81) THE DOJ WITH ASSISTANCE FROM THE STATE OF ILLINOIS STOLE NEARLY THIRTY (30) YEARS OF MR. GRANT'S LIFE.
- (82) MR. GRANT SEEKS \$99 TRILLION IN DAMAGES.
- (83) THE ILLINOIS ATTORNEY GENERAL AND U.S. DEPARTMENT OF JUSTICE DEFAULTED AND FAILED TO DENY MR. GRANT'S ALLEGATIONS IN 16-CV-3245 AND 17-CV-3261.
- (84) THE ILCD FAILED TO ENTER DEFAULT JUDGMENT AGAINST THE ILLINOIS ATTORNEY GENERAL AND DOJ.
- (85) THE DOJ DEFAULTED AND FAILED TO DENY MR. GRANT'S ALLEGATIONS IN 19-CV-3001.
- (86) THE ILCD HAS FAILED TO ENTER DEFAULT JUDGMENT AGAINST THE DOJ.

(87) NINETEEN (19) FEDERAL COURTS HAVE NOT FOUND MR GRANT'S ALLEGATIONS TO BE: 28 USC 1915(e)(2)(B)(i);
28 USC 1915(e)(2)(B)(ii); OR
28 USC 1915(e)(2)(B)(iii).

(88) 113 EXHIBITS IN SUPPORT OF MR GRANT'S ALLEGATIONS ARE DOCKETED IN 16-CV-3245, 17-CV-3261, 19-CV-3001, AND 19-CV-3020.
OPERATIONS HOMETOWN GLORY IS A SPECIAL COLLECTION SERVICE (U.S. DEPARTMENT OF DEFENSE) DOMESTIC BLACK OPERATION RUN UNDER THE BANNER OF THE U.S. DEPARTMENT OF JUSTICE.

(89) THE SPECIAL COLLECTION SERVICE IS A "JOINT" CENTRAL INTELLIGENCE AGENCY AND NATIONAL SECURITY AGENCY PROGRAM.

(90) THE OFFICE OF THE SECRETARY OF DEFENSE HAS DESIGNATED OPERATIONS HOMETOWN GLORY AS A SPECIAL COLLECTION SERVICE PROGRAM.

(91) THE CENTRAL INTELLIGENCE AGENCY IS LIABLE FOR THE ACTIONS OF THE SPECIAL COLLECTION SERVICE.

(92) THE DOD REMEMBERS 'NAM

(93) MR. GRANT'S WITNESSES

MICHAEL J MADIGAN
JESSE WHITE
EMIL JONES
BARACK H. OBAMA

(94) [REDACTED] THE FUNDS TO CREATE MR GRANT CAME FROM THE STRATEGIC DEFENSE INITIATIVE (MISSILE DEFENSE AGENCY).

- (96) RES JUDICATA IS NOT APPLICABLE. THE ILLINOIS ATTORNEY GENERAL AND STATE OF ILLINOIS HAVE NOT FILED ANSWERS TO [REDACTED] MR. GRANT'S ALLEGATIONS IN 16-CV-3245, 17-CV-3261, AND 19-CV-3002. MR. GRANT'S COMPLAINT HAS NOT BEEN DECIDED ON THE MERITS.
- (97) ILLINOIS NORTHERN DISTRICT JUDGE VIRGINIA M. KENDALL (17-CV-7902) DID NOT FIND MR. GRANT'S ALLEGATIONS TO BE: 28 USC 1915(e)(2)(B)(i); 28 USC 1915(e)(2)(B)(ii); OR 28 USC 1915(e)(2)(B)(iii).
- (98) ILLINOIS SOUTHERN DISTRICT JUDGES: MICHAEL J. REAGAN (17-CV-1257); NANCY J. ROSENSTENGEL (18-CV-806); AND STACI M. YANDLE (19-CV-332) DID NOT FIND MR. GRANT'S ALLEGATIONS TO BE: 28 USC 1915(e)(2)(B)(i); 28 USC 1915(e)(2)(B)(ii); OR 28 USC 1915(e)(2)(B)(iii).
- (99) EASTERN DISTRICT OF VIRGINIA JUDGES: LEONIE M. BRINKEMA (18-CV-449); ANTHONY J. TRENTA (18-CV-543); ROBERT F. PAYNE (18-CV-369); AND LEONIE M. BRINKEMA (18-CV-1328) DID NOT FIND MR. GRANT'S ALLEGATIONS TO BE: 28 USC 1915(e)(2)(B)(i); 28 USC 1915(e)(2)(B)(ii); OR 28 USC 1915(e)(2)(B)(iii).
- (100) DISTRICT OF COLUMBIA JUDGES: TANYA S. CHUTKAN (17-CV-1434); JAMES E. BOASBERG (18-CV-1162); RUDOLPH CONTRERAS (18-CV-1806); CHRISTOPHER R. COOPER (18-CV-1804) DID NOT FIND MR. GRANT'S ALLEGATIONS TO BE: 28 USC 1915(e)(2)(B)(i); 28 USC 1915(e)(2)(B)(ii); OR 28 USC 1915(e)(2)(B)(iii).
- (12) 28 USC 1915(e)(2)(B)(iii).

(95) MR. GRANT BEGAN HIS LAWSUIT IN MAY OF 2016
 [REDACTED] IN THE ILCD WITHIN THE STATUTE OF LIMITATIONS.

- (101) TONY BLAIR SAID, "ENGLAND'S NOT DOWN. IT'S IN. ENGLAND IS NEVER DOWN."
- (102) THOMAS W. COATS HAS A SMALL PENIS. TOM HOPPER DOES NOT.
- (103) SHAWN CARTER IS THE BEST BIG BROTHER A KID COULD ASK FOR.
- (104) STEVE JOBS HAS A LARGE PENIS. STEVE JOBS HAS AN ASHTON KUTCHER SIZE PENIS.
- (105) FREDDIE STROMP IS THE SAME SIZE AS TOM HOPPER.
- (106) DISTRICT OF MARYLAND JUDGES: GEORGE L. RUSSELL III (18-cv-1327 + 19-cv-2265) [REDACTED] AND PAULA XINTS (18-cv-1705) DID NOT FIND MR. GRANT'S ALLEGATIONS TO BE:
- (113) ALAN D. BRENTS IS THE WORST BROTHER [REDACTED] THE PENTAGON COULD FIND FOR MR. GRANT. 28 USC 1915(e)(2)(B)(i);
 28 USC 1915(e)(2)(B)(ii);
 OR
 28 USC 1915(e)(2)(B)(iii).
- (107) ADELE IS THE BEST.
- (108) [REDACTED] COURT OF FEDERAL CLAIMS JUDGES: PATRICIA F. CAMPBELL-SMITH (16-1621C) AND LOREN A. SMITH (17-1785C + 18-1687) DID NOT FIND MR. GRANT'S ALLEGATIONS TO BE:
- (111) THE JCOS SAID, "J. LIGHTFOOT IS A REAL C*NT." 28 USC 1915(e)(2)(B)(i);
 28 USC 1915(e)(2)(B)(ii); OR
 28 USC 1915(e)(2)(B)(iii). *Will 11/4/2019*
- (112) EARLINE CHRISTIAN IS A REAL B*TCH.
- (109) THOMAS W. COATS HAS A SMALL PENIS.
- (110) THE DOD REMEMBERS 'NAM.

(13)

WILLIAM LEE GRANT II
 901 WYTHE ROAD
 SPRINGFIELD, IL 62702
 (217) 726-5269

(114) GREGORY K. HARRIS AND THE DOD DIRECTED THE ACTIONS OF THE STATE OF ILLINOIS.

(115) THE DOD AND GREGORY K. HARRIS ACTED THROUGH THE STATE OF ILLINOIS AND ITS OFFICIALS (AND EMPLOYEES) TO CONSPIRE AGAINST MR. GRANT.

(116) THE OFFICE OF THE SECRETARY OF DEFENSE USED "THE LAWYERS" FROM JOINT SPECIAL OPERATIONS COMMAND (JSOC) TO ENGINEER MR. GRANT'S LIFE TO GIVE MR. GRANT CAUSE TO APPEAR IN FEDERAL COURT.

(117) MR. GRANT HAS BEEN UNABLE TO PROCEED IN THE ILND, ILSD, EDVA, MARYLAND, OR DDC
[REDACTED]
EASTERN

(118) THE DISTRICT OF [REDACTED] MICHIGAN [REDACTED] HAS JURISDICTION PURSUANT TO § 28 USC 1331(b)(3). [REDACTED]

(119) [REDACTED], NDGA, NEBRASKA, MARYLAND, NDWV, WDVA, EDNC, MDFL, EDNY, ALND, GFC, AND FED CIR HAVE NOT FOUND MR. GRANT'S ALLEGATIONS TO BE § 28 USC 1915(e)(2)(B)(i),
§ 28 USC 1915(e)(2)(B)(ii); OR
§ 28 USC 1915(e)(2)(B)(iii).

11/4/2019

Will Lee

William Lee Grant II
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- 120 THE COMMANDER-IN-CHIEF DIRECTED THE CREATION OF MR GRANT, AND IS LIABLE FOR THE ACTIONS OF THE SECRETARY OF DEFENSE, AND THE U.S. DEPARTMENT OF DEFENSE.
- 122 THE DOD "HACKED" MR GRANT'S CELLULAR PHONE AND COMPUTER THE DOD KEPT MR. GRANT UNDER SATELLITE SURVEILLANCE FOR NEARLY THIRTY (30) YEARS.
- 123 THE ILLEGAL SURVEILLANCE OF MR [REDACTED] GRANT IS A VIOLATION OF MR GRANT'S U.S. CONST. AMEND IV RIGHT.
- 124 GREGORY K. HARRIS COLLUDING WITH MR GRANT'S LAWYERS TO UNDERMINE MR. GRANT'S LEGAL DEFENSE [REDACTED] FOR DOMESTIC BATTERY AND DUI IS A VIOLATION OF MR GRANT'S U.S. CONST. AMEND V RIGHT.
- 125 MR. GRANT BEING DETAINED IN ILLINOIS FOR NEARLY THIRTY (30) YEARS TO BRING THIS ACTION IS A VIOLATION OF MR. GRANT'S U.S. CONST. AMEND XIII RIGHT.
- 126 THE DOD AND STATE OF ILLINOIS DEPRIVING MR GRANT OF HIS RIGHTS AND PROTECTIONS AS A CITIZEN OF THE UNITED STATES IS A VIOLATION OF MR GRANT'S U.S. CONST. AMEND XIV RIGHT.
- 128 MR GRANT BEGAN HIS LAWSUIT IN MAY OF 2016 IN THE ILLINOIS CENTRAL DISTRICT WITHIN THE STATUTE OF LIMITATIONS [REDACTED]

15

Will Lee II/4/2019
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GRANT II v CIA ET AL.

EXHIBIT IN SUPPORT OF COMPLAINT

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

WILLIAM LEE GRANT II,

Plaintiff,

v.

SPECIAL COLLECTION SERVICE, et al.,

Defendants.

Case No. 3:19-cv-00248-RRB

ORDER OF DISMISSAL

On September 10, 2019, self-represented litigant, William Lee Grant II, filed a Civil Liberties Complaint, along with an Application to Waive the Filing Fee.¹

Mr. Grant alleges a vast conspiracy in which he names the Special Collection Service, Office of the Secretary of Defense, the Missile Defense Agency, the State of Illinois as defendants.² Mr. Grant alleges constitutional violations under the Fourth, Fifth, Seventh, and Fourteenth Amendments of the U.S. Constitution, styled as: "What are the Ramifications of the DOD keeping Mr. Grant in Illinois for nearly thirty (30) years under the threat of military force?"

Mr. Grant alleges that President Ronald Reagan directed the Secretary of Defense and the Joint Chiefs of Staff to create Mr. Grant "to predict future nuclear attacks against the United States."³ He further alleges that in 1992, he was taken

¹ Dockets 1-2.

² Docket 1 at 1.

³ Docket 1 at 3.

to Springfield, Illinois, where he was “beaten; endure[d] psychological warfare; and to be the U.S. Department of Defense’s witness to the 9/11 terrorist attacks,” and was illegally surveilled by the U.S. Attorney’s Office for the District of Central Illinois.⁴ He further alleges that the government surveillance resulted in interference with his medical care and a false driving under the influence charge, and forced him to “act gay” under threat of sexual violence.⁵ Mr. Grant also alleges that he worked for the State of Illinois, but his employment was fraught with difficulties and ended in him “blacklisted.”⁶

Mr. Grant makes vast allegations against numerous government officials and agencies.⁷ He alleges that he has been sexually assaulted by several people at the direction of an Assistant U.S. Attorney. He also alleges a variety of political and government conspiracy theories citing numerous local, state, and federal government officials and agencies, including the Central Intelligence Agency, the National Security Agency, and the Missile Defense Agency. Mr. Grant also alleges a variety of celebrity and international conspiracy theories including, but not limited to, those surrounding British royalty, Louis Farrakhan, Suge Knight, O.J. Simpson, and Kurt Cobain, and discusses the genitals of several public figures.

⁴ Docket 1 at 2-3.

⁵ Docket 1 at 4-7.

⁶ Docket 1 at 5-6.

⁷ Docket 1 at 7-14.

For relief, Mr. Grant requests damages in the amount of "\$99 trillion."⁸

SCREENING REQUIREMENT

Federal law requires a court to conduct an initial screening of a civil complaint filed by a self-represented litigant seeking to proceed in a lawsuit in federal court without paying the filing fee.⁹ In this screening, the court shall dismiss the case at any time if it determines that the action:

- (i) is frivolous or malicious;
- (ii) fails to state a claim on which relief may be granted; or
- (iii) seeks monetary relief against a defendant who is immune from such relief.¹⁰

To determine whether a complaint states a valid claim for relief, courts consider whether the complaint contains sufficient factual matter that, if accepted as true, "state[s] a claim to relief that is plausible on its face."¹¹ In conducting its review, the court must liberally construe a self-represented plaintiff's pleading and

⁸ Docket 1 at 12.

⁹ See, e.g., *Lopez v. Smith*, 203 F.3d 1122, 1126 n.7 (9th Cir. 2000).

¹⁰ 28 U.S.C. § 1915(e)(2)(B).

¹¹ *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (citing *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 570 (2007)). In making this determination, a court may consider "materials that are submitted with and attached to the Complaint." *United States v. Corinthian Colleges*, 655 F.3d 984, 999 (9th Cir. 2011) (citing *Lee v. L.A.*, 250 F.3d 668, 688 (9th Cir. 2001)).

give the plaintiff the benefit of the doubt.¹² Before the court may dismiss any portion of a complaint for failure to state a claim upon which relief may be granted, it must provide the plaintiff with a statement of the deficiencies in the complaint and an opportunity to amend or otherwise address the problems, unless to do so would be futile.¹³

DISCUSSION

Mr. Grant has failed to state a claim upon which relief can be granted by this Court. Additionally, Mr. Grant has already litigated these allegations at multiple courts across the country, rendering this lawsuit frivolous. Therefore, the complaint must be dismissed with prejudice.

I. Failure to State a Claim

A complaint needs to provide “a short and plain” description of claims and what specific law was violated. Rule 8 of the Federal Rules of Civil Procedure expressly requires that a plaintiff provide “a short and plain statement of the claim showing that the pleader is entitled to relief.”¹⁴ Mr. Grant’s complaint is a dense narrative which discusses his numerous allegations concerning his own birth or

¹² See *Hebbe v. Pliler*, 627 F.3d 338, 342 (9th Cir. 2010) (citing *Bretz v. Kelman*, 773 F.2d 1026, 1027 n.1 (9th Cir. 1985) (en banc)).

¹³ See *Gordon v. City of Oakland*, 627 F.3d 1092, 1094 (9th Cir. 2010) (citing *Albrecht v. Lund*, 845 F.2d 193, 195 (9th Cir. 1988)).

¹⁴ Fed. R. Civ. P. 8(a)(2).

"creation," his role as part of a Department of Defense creation and/or operative, specific events that occurred at unknown places and times in his life, and numerous government and celebrity conspiracy theories.

Mr. Grant has not alleged a short and plain statement of the facts that shows a violation of Mr. Grant's constitutional rights by any of the named defendants. Importantly, Mr. Grant does not allege facts that support his core allegation: "What are the ramifications of the DOD keeping Mr. Grant in Illinois for nearly thirty (30) years under the threat of military force?" Even if Mr. Grant has a legitimate employment claim against the State of Illinois, the District of Alaska would be an improper venue and there are no facts to support a transfer of this case to Illinois.¹⁵ This is especially true in light of Mr. Grant's extensive litigation featuring some or all of the defendants across all the federal district courts of Illinois.¹⁶ Thus, Mr.

¹⁵ See generally 28 U.S.C. §§ 1391, 1404.

¹⁶ Judicial notice is the "court's acceptance, for purposes of convenience and without requiring a party's proof, of a well-known and indisputable fact; the court's power to accept such a fact." *Black's Law Dictionary* (10th ed. 2014); see also *Headwaters Inc. v. U.S. Forest Service*, 399 F.3d 1047, 1051 n.3 (9th Cir. 2005) ("Materials from a proceeding in another tribunal are appropriate for judicial notice.") (internal quotation marks and citation omitted); see also Fed. R. Evid. 201; *See Grant, II v. U.S. Dept. of Defense et al.*, Case No. 3:19-cv-00979 (S.D. Ill. 2019); *Grant v. U.S. Dept. of Defense*, Case No. 3:19-cv-00332 (S.D. Ill. 2019); *Grant v. Office of the Illinois Governor*, Case No. 3:19-cv-03025 (C.D. Ill. 2019); *Grant v. U.S. Department of Defense et al.*, Case No. 3:19-cv-03020 (C.D. 2019); *Grant v. Dunford et al.*, Case No. 3:19-cv-03016 (C.D. Ill. 2019); *Grant v. Dunford et al.*, Case No. 3:19-cv-03019 (C.D. Ill. 2019); *Grant v. Mattis et al.*, Case No. 3:19-cv-03018 (C.D. Ill. 2019); *Grant v. Harris et al.*, Case No. 3:19-cv-03017 (C.D. Ill. 2019); *Grant v. Harris et al.*, Case No. 3:19-cv-03015 (C.D. Ill. 2019); *Grant v. Mattis et al.*, Case No. 3:19-cv-03014 (C.D. Ill. 2019); *Grant v. U.S. Department of Defense et al.*, Case No. 3:19-cv-03001 (C.D. 2019); *Grant v. US Department of Defense*, Case No. 3:18-cv-03189 (C.D. Ill. 2018); *Grant v. US*

3:19-cv-00248-RRB, *Grant v. Special Collection Service, et al.*

Order of Dismissal

Page 5 of 7

Grant has failed to state a claim upon which relief may be granted, and his complaint must be dismissed.

II. Frivolous Lawsuits

In accordance with federal law, a court must dismiss a case “at any time if the court determines that the action or appeal is frivolous or malicious.”¹⁷ The term frivolous, or frivolous as a matter of law, is a legal term. It means that a case or complaint “lacks an arguable basis either in law or in fact.”¹⁸ When a court evaluates for whether a complaint is frivolous, it must “pierce the veil of the complaint’s factual allegations to determine whether they are fanciful, fantastic, or delusional.”¹⁹ Additionally, a complaint may be frivolous if it merely repeats pending or previously litigated claims.²⁰

Department of Defense, Case No. 3:18-cv-03131 (C.D. Ill. 2019); *Grant v. US Department of Transportation et al.*, Case No. 3:18-cv-03130 (C.D. Ill. 2018); *Grant v. Office of the Illinois Governor*, Case No. 3:18-cv-03073 (C.D. Ill. 2018); *Grant v. Illinois Department of Employment Security*, Case No. 3:18-cv-03054 (C.D. Ill. 2018); *Grant v. Kabaker et al.*, Case No. 3:17-cv-03302 (C.D. Ill. 2017); *Grant v. U.S. Department of Justice*, Case No. 3:17-cv-03274 (C.D. Ill. 2017); *Grant, II v. U.S. Department of Justice*, Case No. 3:17-cv-01257 (S.D. Ill. 2017); *Grant v. Kabaker et al.*, Case No. 3:17-cv-03261 (C.D. Ill. 2017); *Grant v. Kabaker et al.*, Case No. 3:17-cv-03257 (C.D. Ill. 2017); *Grant v. Kabaker et al.*, Case No. 1:17-cv-07092 (N.D. Ill. 2017); *Grant v. Illinois Department of Employment Security*; Case No. 3:17-cv-03207 (C.D. Ill. 2017); *Grant v. State of Illinois*, Case No. 3:17-cv-03206 (C.D. Ill. 2017); *Grant v. Illinois Department of Transportation*; Case No. 3:17-cv-03203 (C.D. Ill. 2017).

¹⁷ 28 U.S.C. § 1915(e)(2)(B); see also 28 U.S.C. § 1915A(b)(1); 42 U.S.C. § 1997e(c)(1).

¹⁸ *Neitzke v. Williams*, 490 U.S. 319, 325 (1989).

¹⁹ *Neitzke*, 490 U.S. at 327-28; see also *Denton v. Hernandez*, 504 U.S. 25, 33 (1992).

²⁰ *Cato v. United States*, 70 F.3d 1103, 1105 n.2 (9th Cir. 1995).

Mr. Grant's complaint does not present allegations that support a claim with an arguable basis in either law or fact. Mr. Grant's narrative begins with his allegation that he was created by the Department of the Defense inside the Pentagon and ends with a listing of celebrity conspiracy theories. Additionally, by Mr. Grant's own admission in addition to the Court's review of dockets across the country, Mr. Grant has litigated these claims in numerous courts.²¹ Accordingly, because Mr. Grant's complaint does not demonstrate an arguable basis in law or fact, in addition to have been filed in numerous other jurisdictions, this case is frivolous. Therefore, it must be dismissed.

IT IS THEREFORE ORDERED:

1. The Complaint is DISMISSED WITH PREJUDICE for failure to state a claim upon which relief may be granted and frivolousness;
2. All pending motions are DENIED AS MOOT.
3. The Clerk of Court is directed to enter a Final Judgment in this case.

DATED at Anchorage, Alaska this 30th day of October, 2019.

COURT DID NOT FIND
MR GRANT'S ALLEGATIONS TO BE 28 USC 1915(e)(2)(B)(i),
28 USC 1915(e)(2)(B)(ii), OR
28 USC 1915(e)(2)(B)(iii). *Wen. 11/4/2019*

/s/ Ralph R. Beistline
Senior United States District Judge

²¹ Docket 1 at 1-2, 10, 13-14; see also *supra* FN 16; the Court takes judicial notice that a search of district court filings from Mr. William Lee Grant returns 131 case filings. These filings feature the same or similar defendants across the country, including the District Courts of Massachusetts, Tennessee, California, Colorado, Hawaii, Virginia, Utah, Maryland, Florida, Guam, the Northern Mariana Islands, North Carolina, Rhode Island, the Virgin Islands, Texas, District of Columbia, New York, and Nebraska.

EXHIBIT IN SUPPORT OF COMPLAINT

TELETYPE
Illinois Department of Employment Security
 Appeals - Springfield
 607 East Adams, 9th Floor
 Springfield, IL 62701
 Phone: (800) 244-5631 · TTY: (888) 205-3145
www.ides.illinois.gov

GRANT II
 V
 CIA ET AL

WILLIAM L. GRANT
 901 WYTHE RD
 SPRINGFIELD, IL 62702-3428

Date Mailed: 03/10/2015
 Claimant ID: 2703013
 Docket Number: 1505989
 Appeal Filed Date: 02/03/2015
 Date of Hearing: 03/06/2015
 Type of Hearing: Telephone
 Place of Hearing: Springfield

Administrative Law Judge's Decision
 (Este es un documento importante. Si usted necesita un intérprete, póngase en contacto con el Centro de Servicio al Reclamante al (800) 244-5631)

Claimant Appellant
 WILLIAM L. GRANT
 901 WYTHE RD
 SPRINGFIELD, IL 62702-3428

Employer
 DEPT OF TRANSPORTATION DEPT OF
 TRANSPORTATION
 2300 S DIRKSEN PKWY
 SPRINGFIELD, IL 62764-0001

Appearances/Issues/Employer Status: The claimant and employer appeared and testified. Whether the Claimant left work voluntarily without good cause attributable to the employer? See 820 ILCS 405/601A. The employer is a party to the appeal.

Findings of Fact: The claimant worked for the employer as a technical manager/staff assistant in the legal department. He was paid about \$47,500 a year, began in 2012 and last worked on or about October 27, 2014. The claimant was advised in August of 2014 that the employer was going to lay him off at the end of September. The union filed a lawsuit and the layoff was postponed until the end of October of 2014. The claimant was then advised the layoff has been postponed indefinitely. The claimant was on a month to month lease. The landlord did not renew the lease for the month of November. The claimant returned to his hometown area in Springfield, stopped reporting to his Chicago employer work location and attempted to get a transfer through the Governor's office. The claimant reported to the Governor's office in constituent serves in November and turned in time sheets for November 6, 7, and 10, 2015. The claimant was not paid and there was subsequent contact with this employer regarding pay and his work status. The claimant was ultimately not paid by this employer given he was not working for the employer and was not on its jobsite. The claimant submitted a resignation to the employer on November 21, 2014 effective November 5, 2014. The claimant did not submit any more time sheets to the Governor's office and on or about December 3, 2014 was advised a transfer was not approved there.

Conclusion: 820 ILCS 405/601A provides that an individual shall be ineligible for benefits for the weeks in which he has left work voluntarily without good cause attributable to the employing unit and, thereafter, until he has become reemployed and has had earnings equal to or in excess of his current weekly benefit amount in each of four calendar weeks.

The claimant quit his job in Chicago primarily due to issues with his living arrangements. There was also evidence he sought and believed he may have had another job. While the claimant may have had a good reason to quit, the leaving was not attributable to the employer as the employer did not materially change the terms of the working agreement. There was not sufficient evidence to support a finding of an exemption. The claimant was not hired at the Governor's office and was not paid any wages. While he testified that he worked at the Governor's office for a month, the claimant only submitted approximately three days of time sheets for payment (none of which were honored). The claimant is disqualified for benefits under Section 601A of the Act.

Decision: The Local Office Determination is AFFIRMED. Pursuant to 820 ILCS 405/601A, the claimant is disqualified for benefits. The claimant is not eligible for benefits from 11/30/2014.

JOHN SCHELLENBERG, Administrative Law Judge
 Appeals - Springfield
 Fax: (309) 671-3121

L11L

Page 1 of 2

APL011L

MR. GRANT QUALIFIED FOR BENEFITS PURSUANT TO
 820 ILCS 405/601(B)(2).

EXHIBIT IN SUPPORT OF COMPLAINT

7-2013-3997

Illinois Department of Employment Security
 Appeals - Springfield
 607 East Adams, 9th Floor
 Springfield, IL 62701
 Phone: (800) 244-5631 • TTY: (888) 205-3145
www.ides.illinois.gov

GRANT II
 v
CIA ET AL

WILLIAM L. GRANT
 901 WYTHE RD
 SPRINGFIELD, IL 62702-3428

Date Mailed: 03/10/2015
 Claimant ID: 2703013
 Docket Number: 1505989
 Appeal Filed Date: 02/03/2015
 Date of Hearing: 03/06/2015
 Type of Hearing: Telephone
 Place of Hearing: Springfield

Administrative Law Judge's Decision
 (Este es un documento importante. Si usted necesita un intérprete, póngase en contacto con el Centro de Servicio al Reclamante al (800) 244-5631)

Claimant Appellant
 WILLIAM L. GRANT
 901 WYTHE RD
 SPRINGFIELD, IL 62702-3428

Employer
 DEPT OF TRANSPORTATION DEPT OF
 TRANSPORTATION
 2300 S DIRKSEN PKWY
 SPRINGFIELD, IL 62764-0001

Appearances/Issues/Employer Status: The claimant and employer appeared and testified. Whether the Claimant left work voluntarily without good cause attributable to the employer? See 820 ILCS 405/601A. The employer is a party to the appeal.

Findings of Fact: The claimant worked for the employer as a technical manager/staff assistant in the legal department. He was paid about \$47,500 a year, began in 2012 and last worked on or about October 27, 2014. The claimant was advised in August of 2014 that the employer was going to lay him off at the end of September. The union filed a lawsuit and the layoff was postponed until the end of October of 2014. The claimant was then advised the layoff has been postponed indefinitely. The claimant was on a month to month lease. The landlord did not renew the lease for the month of November. The claimant returned to his hometown area in Springfield, stopped reporting to his Chicago employer work location and attempted to get a transfer through the Governor's office. The claimant reported to the Governor's office in constituent serves in November and turned in time sheets for November 6, 7, and 10, 2015. The claimant was not paid and there was subsequent contact with this employer regarding pay and his work status. The claimant was ultimately not paid by this employer given he was not working for the employer and was not on its jobsite. The claimant submitted a resignation to the employer on November 21, 2014 effective November 5, 2014. The claimant did not submit any more time sheets to the Governor's office and on or about December 3, 2014 was advised a transfer was not approved there.

Conclusion: 820 ILCS 405/601A provides that an individual shall be ineligible for benefits for the weeks in which he has left work voluntarily without good cause attributable to the employing unit and, thereafter, until he has become reemployed and has had earnings equal to or in excess of his current weekly benefit amount in each of four calendar weeks.

The claimant quit his job in Chicago primarily due to issues with his living arrangements. There was also evidence he sought and believed he may have had another job. While the claimant may have had a good reason to quit, the leaving was not attributable to the employer as the employer did not materially change the terms of the working agreement. There was not sufficient evidence to support a finding of an exemption. The claimant was not hired at the Governor's office and was not paid any wages. While he payment (none of which were honored). The claimant is disqualified for benefits under Section 601A of the Act.

Decision: The Local Office Determination is AFFIRMED. Pursuant to 820 ILCS 405/601A, the claimant is disqualified for benefits. The claimant is not eligible for benefits from 11/30/2014.

JOHN SCHELLENBERG, Administrative Law Judge
 Appeals - Springfield
 Fax: (309) 671-3121

L11L

Page 1 of 2

APL011L

MR. GRANT QUALIFIED FOR BENEFITS PURSUANT TO
 820 ILCS 405/601(B)(2).

EXHIBIT IN SUPPORT OF COMPLAINT

GRANT II
V
CIA ET AL



SHEILA SIMON

LIEUTENANT GOVERNOR
STATE OF ILLINOIS

December 2, 2011

Re: Will Grant

Dear Friends,

It is with some sadness that I recommend Will Grant for your consideration as an employee. I am sad to do so because I will miss him on my staff.

Will has worked on my staff for almost a year now, and I have benefitted greatly. He is open and engaging, traits which make him such a good person for the constituent contact he has on a daily basis. In addition to doing his work well, Will has the extra quality of being good to work with. I have consistently enjoyed my interactions with Will, whether it has been about the needs of constituents or about his crazy vegetable diet.

I should also add, because of our history as a state, Will should not be given any special consideration based on political connections or my recommendation. I write this letter as one employer to another employer. I ask that you consider Will and all of his qualifications, and I believe both you and he will be well served.

Thanks, and please feel free to call me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Sheila Simon".
Sheila Simon
Lt. Governor of Illinois

IDOT
District 9 Headquarters
Carbondale, IL 62903
Phone: (618) 529-6452
Fax: (618) 529-6455

214 State House
Springfield, IL 62706
Phone: (217) 558-3085
Fax: (217) 558-3092
TTY: 1-800-563-7110

JRTC, 15200
Chicago, IL 60601
Phone: (312) 814-5240
Fax: (312) 814-5228

FORMED ON RECYCLED PAPER

EXHIBIT IN SUPPORT OF COMPLAINT

GRANT II
V
CIA ET AL



SHEILA SIMON

LIEUTENANT GOVERNOR
STATE OF ILLINOIS

December 2, 2011

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I should also add, because of our history as a state, Will should not be given any special consideration based on political connections or my recommendation. I write this letter as one employer to another employer. I ask that you consider Will and all of his qualifications, and I believe both you and he will be well served.

Thanks, and please feel free to call me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Sheila Simon". Below the signature, the text "Sheila Simon" and "Lt. Governor of Illinois" is printed in a smaller font.

IDOT
District 9 Headquarters
Carbondale, IL 62903
Phone: (618) 529-6452
Fax: (618) 529-6455

214 State House
Springfield, IL 62706
Phone: (217) 558-3085
Fax: (217) 558-3096
TTY: 1-800-563-7110

JRTC, 15-200
Chicago, IL 60601
Phone: (312) 814-5240
Fax: (312) 814-5228

Forwarded with my best regards.

EXHIBIT IN SUPPORT OF COMPLAINT

State of Illinois
 Department of Employment Security
www.ides.illinois.gov


**Request for Reconsideration of Claims Adjudicator's Determination and,
 if applicable, Appeal to the Referee**
Claimant Information:

Last Name: Grant First Name: William MI: L
 ID or SSN: 2703013

(Este es un documento importante. Si usted necesita un intérprete, póngase en contacto con su oficina local.)

The reconsideration process is governed by section 703 of the Illinois Unemployment Insurance Act and 56 Ill. Adm. Code 2720.160 Reconsidered Finding or Determination. If your Request for Reconsideration becomes an Appeal as a result of the reconsideration process, your case will be forwarded to the appeals unit.

If you need additional space, please use the other side of this document, if appropriate, or attach a separate sheet of paper.

Appellant: (Check One) Claimant Employer (Employer, please provide Company Name and Account #)
 Name: _____ Account #: _____

Section A: Reason for Request for Reconsideration

I disagree with the claims adjudicator's determination dated 01/21/2015, regarding Issue 009 601A-Voluntary Leaving
 because: _____ (Give all your reasons and facts)

I was informed by the Illinois Department of Transportation (IDOT) that I was to be laid-off under a "material reorganization" for holding the position of Staff Assistant.

I was offered employment by the Office of the Illinois Governor. I worked for the Office of the Illinois Governor from November 6, 2014 to December 3, 2014.

According to the rules of the Illinois Department of Employment Security, the evidence shows that I did not lose employment through any fault of my own. I accepted a bona fide offer of employment in good faith.

Please refer to Attachment A for my list of reasons and facts for a Request for Reconsideration and an Appeal. Please refer to Attachments B through E for supporting documentation.

* Note to claimant: You must continue to certify for benefits by Tele-Serve or Online for each two week period that you are unemployed during the appeal process.

Section B: Signature

Signature: William L. Grant Date: 02/03/2015

Name (Printed or Typed): William L. Grant

Telephone Number: 217-726-5269

ADJ024F

Page 1 of 1

BEN-523

Rev. (09/2011)

- I was employed by the Illinois Department of Transportation (IDOT) as a Staff Assistant.
- I received notice that I was to be laid-off effective the close of business on September 30, 2014. As a result, I made temporary living arrangements in Chicago, IL. (See Attachment B.)
- The Teamster 916 Union received a court injunction delaying the effective date of the layoff until after a court appearance in October of 2014. The State of Illinois failed to produce certain documents, and the effective date of the layoff was postponed to a later date.
- As a result, I had to find temporary living arrangements in Chicago. This caused my having to spend an even greater amount of money to procure accommodations in Chicago for work.
- As a result of the layoff, there was a considerable decline in my workload.
- On November 5, 2014, I was informed that Governor Quinn's Deputy Chief of Staff (Justin Cajindos) would ask the Governor's Chief of Staff (Ryan Croke) to approve me to work in Springfield for a few weeks before returning to the IDOT Chicago Office. I was told that the Chief of Staff had no objection, and that he was going to work out an agreement with IDOT's Acting-Secretary (Erika Borggren) to allow me to work in Springfield, IL for a couple of weeks.
- I reported to the Governor's Capitol Office on November 6, 2014 for work.
- Before I reported to the Governor's Capitol Office, I contacted my direct supervisor (Rick Kabaker, Deputy Chief Council) at IDOT via e-mail, and informed him that I was approved to work in Springfield by Governor Quinn's Chief of Staff and Deputy Chief of Staff. (Please see Attachment C.)
- On the morning of November 7, 2014, I was told to report to IDOT's Central Office in Springfield. A short time later, I was told not to report to IDOT's Central Office due to the attorneys handling the IDOT Staff Assistant litigation "freaking out" over my being allowed to work in Springfield. I was instructed to take the day off.
- Over the weekend; I was informed that I would have to resign from IDOT, I would be hired by the Governor's Office, and then most likely transferred to the Illinois Department of Central Management Services (CMS).
- I reported to the Governor's Office (of Constituent Affairs) on November 10, 2014.
- On November 17, 2014, I contacted IDOT's Bureau of Personnel Management to find out why my paycheck was unexpectedly low. Samantha Helton informed that my Office (Office of Chief Council) stated they did not know where I was, and that IDOT's Chief Council advised her to put me on "dock time." She stated that if I sent her time sheets from where I was working, I would receive "back pay." I submitted time sheets on November 18, 2014 via facsimile. (Please see Attachment D.)
- The week of November 17, 2014, I was contacted by the Deputy Director of Personnel of CMS (Israel Salazar), and he informed me that he wanted to put me in a position at CMS.

Number: 1505989



Attachment A



Illinois Department of Transportation

Office of the Secretary
2300 South Dirksen Parkway / Springfield, Illinois / 62764
Telephone 217/782-5597

September 16, 2014

William Grant
901 Wythe Rd
Springfield, IL 62702

Dear Mr. William Grant:

It is with regret that I must inform you that, in accordance with Article XII, Section 1, of the General Teamsters/Professional & Technical Employees Collective Bargaining Agreement (Pro-Tech 916), this correspondence will serve as final notification of the Department's layoff due to material reorganization. Unfortunately, your position has been identified for layoff. The effective date of the layoff is at the close of business on September 30, 2014.

After the layoff, in order to maintain your eligibility for recall, it is your responsibility to keep the Central Bureau of Personnel Management up to date with your current mailing and/or home address. Should you need to update your contact information, please call the Bureau of Personnel Management at 217/782-5594. In accordance with Article XII, Section 5, failure to respond when contacted at the address last given by the employee constitutes removal from the Recall List.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Borggren".

Erica Borggren
Acting Secretary of IDOT

Gmail - Re: out of office

Page 1 of 2



William Grant <wgran2@gmail.com>

Re: out of office
5 messages

William Grant <wgran2@gmail.com>
To: rick.kabaker@illinois.gov
Cc: dot.ch.outofoffice@illinois.gov

Thu, Nov 6, 2014 at 8:57 AM

Rick,

I've been approved to work in Springfield. I'm at the Capitol today.

Sent from my iPhone

Kabaker, Rick <Rick.kabaker@illinois.gov>
To: William Grant <wgran2@gmail.com>

Thu, Nov 6, 2014 at 9:04 AM

Who approved your working in Springfield?

Richard A. Kabaker, Esq.
Deputy Chief Counsel
Illinois Department of Transportation
100 West Randolph Street - Suite 6-600
Chicago, IL 60601
Tel.: 312-793-4838
Fax: 312-793-3933

CONFIDENTIALITY NOTICE: This e-mail is a confidential attorney/client, attorney work product, and/or pre-decisional FOIA exempt document intended solely for the use of the individual(s) to whom it is addressed, and should be handled accordingly. If you are not the intended recipient(s), please be advised that you have received this e-mail in error and that the use, dissemination, forwarding, printing or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please notify Rick Kabaker immediately.

[Quoted text hidden]

William Grant <wgran2@gmail.com>
To: "Kabaker, Rick" <Rick.kabaker@illinois.gov>

Thu, Nov 6, 2014 at 9:24 AM

Gov's Office.

Sent from my iPhone
[Quoted text hidden]

Kabaker, Rick <Rick.kabaker@illinois.gov>
To: William Grant <wgran2@gmail.com>

Thu, Nov 6, 2014 at 9:28 AM

Will: Who in the Gov. Office approved it? Rick

Richard A. Kabaker, Esq.
Deputy Chief Counsel
Illinois Department of Transportation
100 West Randolph Street - Suite 6-600
Chicago, IL 60601
Tel.: 312-793-4838
Fax: 312-793-3933

Attachment

'C'

mhtml:file:///C:/Users/User/Documents/Gmail - Re out of office.mht

Gmail - Re: out of office

Page 2 of 2

CONFIDENTIALITY NOTICE: This e-mail is a confidential attorney/client, attorney work product, and/or pre-decisional FOIA exempt document intended solely for the use of the individual(s) to whom it is addressed, and should be handled accordingly. If you are not the intended recipient(s), please be advised that you have received this e-mail in error and that the use, dissemination, forwarding, printing or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please notify Rick Kabaker immediately.

-----Original Message-----

From: William Grant [mailto:wgran2@gmail.com]
Sent: Thursday, November 06, 2014 9:35 AM

William Grant <wgran2@gmail.com>
To: "Kabaker, Rick" <Rick.kabaker@illinois.gov>

Thu, Nov 6, 2014 at 9:35 AM

COS Croke and Deputy Cajindas. They're both in Chicago today if you want to speak to them.

Sent from my iPhone
100% battery | 100% signal



Office of the Governor

Employee Name: William Grant

Attachment

Employee Signature: WGL

'D'

Supervisor Name: Carmen FlynnSupervisor Signature: Carmen Flynn

HOURS ON OFFICIAL STATE BUSINESS

DAY	DATE	ON	LUNCH OFF	LUNCH ON	DINNER OFF	DINNER ON	OFF	ON	OFF	ON	OFF	STATE BUSINESS
Monday												0:00:00
Tuesday												0:00:00
Wednesday												0:00:00
Thursday	11/6/14	9:15	1:00	1:30		5:15						0:00:00
Friday												0:00:00
Saturday												0:00:00
Sunday												0:00:00
Week Total												0:00:00

TIME OFF:

DAY	DATE	VAC	SICK	PL	COMP	HOLIDAY	OTHER PAID LEAVE	FURLOUGH PERSONAL	FURLOUGH VACATION	FURLOUGH DAY (UNPAID)	TOTAL HOURS	DAILY TOTAL
Monday											0:00:00	0:00:00
Tuesday											0:00:00	0:00:00
Wednesday											0:00:00	0:00:00
Thursday											0:00:00	0:00:00
Friday	11/7/14						FD		7.5 FD		0:00:00	0:00:00
Saturday											0:00:00	0:00:00
Sunday											0:00:00	0:00:00
Week Total											0:00:00	WEEK TOTAL: 0:00:00

Comments:

...1...



Office of the Governor

Employee Name: William GrantEmployee Signature: WGLSupervisor Name: Carmen FlynnSupervisor Signature: Carmen Flynn

HOURS ON OFFICIAL STATE BUSINESS

DAY	DATE	ON	LUNCH OFF	LUNCH ON	DINNER OFF	DINNER ON	OFF	ON	OFF	ON	OFF	STATE BUSINESS
Monday	11/10/14	9:15					5:15					0:00:00
Tuesday												0:00:00
Wednesday	11/12/14	8:45	1:00	1:30		5:15						0:00:00
Thursday		9:00					5:00					0:00:00
Friday		8:45					5:15					0:00:00
Saturday												0:00:00
Sunday												0:00:00
Week Total												0:00:00

TIME OFF:

DAY	DATE	VAC	SICK	PL	COMP	HOLIDAY	OTHER PAID LEAVE	FURLOUGH PERSONAL	FURLOUGH VACATION	FURLOUGH DAY (UNPAID)	TOTAL HOURS	DAILY TOTAL
Monday											0:00:00	0:00:00
Tuesday	11/11/14						7.5				0:00:00	0:00:00
Wednesday											0:00:00	0:00:00
Thursday											0:00:00	0:00:00
Friday											0:00:00	0:00:00
Saturday											0:00:00	0:00:00
Sunday											0:00:00	0:00:00
Week Total											0:00:00	WEEK TOTAL: 0:00:00

Comments:

WGL

- On November 21, 2014, I was contacted by Governor Quinn's Deputy Chief of Staff (Juan Morado), and informed that I needed to submit my resignation to IDOT through my former supervisor, Rick Kabaker. (Please see Attachment E.)
- I worked in the Governor's Office of Constituent Affairs from November 10, 2014 until the close of business on December 3, 2014, excluding holidays. Two time sheets are attached. The time sheets are signed by Carmen Flynn, the previous Deputy Director of the Governor's Office of Constituent Affairs. (Please see Attachment D.)
- I was informed after the close of business on December 3, 2014 I was unable to be added to the payroll (i.e., get paid) due to the litigation between IDOT and the Teamster's 916 Union.



Illinois Department of Transportation

Office of the Secretary
2300 South Dirksen Parkway / Springfield, Illinois / 62784
Telephone 217/782-5597

August 21, 2014

Mr. Tony Barr
President, General Teamsters/ Professional & Technical Employees Local
Union No. 916
3361 Teamster Way
Springfield, IL 62707

Dear Tony:

In accordance with Article XII, Layoff, of the Collective Bargaining Agreement, this correspondence is your official notification of the Department's intent to initiate a layoff for the position title of Staff Assistants. The proposed effective date of the layoff is at the close of business September 30, 2014, and the reason for the layoff is due to a material reorganization.

The following Collective Bargaining titles for which your organization has exclusive representation rights are proposed for inclusion:

Position Classifications	Bargaining Unit	Number of Employees	Work County
Technical Manager I	PM	3	Sangamon
Technical Manager II	PM	16	Cook
Technical Manager II	PM	8	Sangamon
Technical Manager II	PM	2	Effingham
Technical Manager II	PM	3	Madison
Technical Manager II	PM	2	Jackson
Technical Manager III	PM	7	Cook
Technical Manager III	PM	7	Sangamon
Technical Manager III	PM	1	Jackson
Technical Manager IV	PM	3	Sangamon
Technical Manager IV	PM	2	Madison
Technical Manager V	PM	1	Cook

Questions concerning this layoff may be addressed to Tony Small, Director, Finance & Administration at 217-782-1816.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Borggren".

Erica Borggren
Acting Secretary of IDOT

Attachment

A handwritten mark consisting of a stylized 'M' or 'N' shape.

'B'

cket Number: 1505989

Gmail - RE: Resignation

Page 1 of 1

GM II

William Grant <wgran2@gmail.com>

RE: Resignation

1 message

Grant, William L. (GOV) <William L Grant@illinois.gov>
To: "Kabaker Rick" <Rick.kabaker@illinois.gov>

Fri, Nov 21 2014 at 10:54 AM

I hereby submit my resignation effective November 5, 2014

Attachment

'Tz'

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

WILLIAM LEE GRANT II

(b) County of Residence of First Listed Plaintiff SAN JUAN (IL)
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

PRO-SF
907 WYTHE ROAD, SPRINGFIELD, IL 62702
(217) 726-5269

DEFENDANTS

CENTRAL INTELLIGENCE AGENCY
& SPECIAL COLLECTION SERVICE

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- | | |
|---|--|
| <input type="checkbox"/> 1 U.S. Government Plaintiff | <input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) |
| <input checked="" type="checkbox"/> 2 U.S. Government Defendant | <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III) |

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Citizen of This State	PTF	DEF	Citizen of Another State	PTF	DEF
<input type="checkbox"/>	<input type="checkbox"/> 1	<input type="checkbox"/> 1	<input type="checkbox"/>	<input type="checkbox"/> 4	<input type="checkbox"/> 4
<input type="checkbox"/>	<input type="checkbox"/> 2	<input type="checkbox"/> 2	<input type="checkbox"/>	<input type="checkbox"/> 5	<input type="checkbox"/> 5
<input type="checkbox"/>	<input type="checkbox"/> 3	<input type="checkbox"/> 3	<input type="checkbox"/>	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	PERSONAL INJURY	PERSONAL INJURY	PROPERTY RIGHTS	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 376 Qui Tam (31 USC 3729 (a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> Pharmaceutical Personal Injury Product Liability	SOCIAL SECURITY	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine Product Liability	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 863 DIWC/DIW (405(g))	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 480 Consumer Credit
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 440 Other Civil Rights	FEDERAL TAX SUITS	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 850 Securities/Commodities/ Exchange
<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	<input type="checkbox"/> 890 Other Statutory Actions
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	IMMIGRATION	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 445 Amer w Disabilities Employment	Habeas Corpus:	<input type="checkbox"/> 463 Habeas Corpus - Alien Detainee (Prisoner Petition)	<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 446 Amer. w/Disabilities Other	<input type="checkbox"/> 530 General	<input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 896 Arbitration
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 535 Death Penalty		<input type="checkbox"/> 899 Administrative Procedure Act: Review or Appeal of Agency Decision
<input type="checkbox"/> 245 Tort Product Liability		<input type="checkbox"/> 540 Mandamus & Other		<input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 290 All Other Real Property		<input type="checkbox"/> 550 Civil Rights		
		<input type="checkbox"/> 555 Prison Condition		
		<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		

V. ORIGIN (Place an "X" in One Box Only)

- | | | | | | |
|---|---|--|---|--|---|
| <input checked="" type="checkbox"/> 1 Original Proceeding | <input type="checkbox"/> 2 Removed from State Court | <input type="checkbox"/> 3 Remanded from Appellate Court | <input type="checkbox"/> 4 Reinstated or Reopened | <input type="checkbox"/> 5 Transferred from Another District | <input type="checkbox"/> 6 Multidistrict Litigation (specify) |
|---|---|--|---|--|---|

VI. CAUSE OF ACTION (Enter U.S. Civil Statute under which you are filing and write a brief statement of cause.)

42 USC 1985(3)
CONSPIRACY + RETALIATION

VII. Previous Bankruptcy Matters (For nature of suit 422 and 423, enter the case number and judge for any associated bankruptcy matter previously adjudicated by a judge of this Court. Use a separate attachment if necessary.)

VIII. REQUESTED IN COMPLAINT:

 CHECK IF THIS IS A CLASS ACTION
UNDER RULE 23, F.R.C.P.

DEMAND \$

\$ 99,000,000,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND: Yes NoIX. RELATED CASE(S)
IF ANY

(See instructions):

JUDGE

BRUCE - 16-CV-3245 + 17-CV-3261
MCDADE - 19-CV-3001 DOCKET NUMBER 19-CV-3000X. This case (check one box) Is not a resiling of a previously dismissed action Is a resiling of case number previously dismissed by Judge

DATE

SIGNATURE OF ATTORNEY OF RECORD

Well (PRO-SF) 17/24/2029 16-CV-3245, 17-CV-3261
19-CV-3001, + 19-CV-3020

Office of the Clerk

U.S. DISTRICT COURT

Eastern District of Missouri

St. Louis, Missouri 63102

OFFICIAL BUSINESS



William Lee Grant, II
901 WYTHE ROAD
SPRINGFIELD, IL 62702

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U.S. DISTRICT COURT

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DETROIT, MI 48206

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